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CINCINNATI COMMUNITY VIDEO

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February 14, 1997

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of
Closed-Captioning and Video
Description of Programming
Implementation of Section 305 of the
Telecommunications Act of 1996
Video Programming Accessibility

MM Docket No. 95-176

COMMENTS OF CINCINNATI COMMUNITY VIDEO
IN THE NOTICE OF PROPOSED RULEMAKING

Cincinnati Community Video respectfully submits the following comments in response to the Notice of Proposed Rulemaking, in the above-captioned proceeding, released January 17, 1997 ("NPRM"). The Commission seeks to issue rules implementing Section 713 of the 1996 Communications Act.

Cincinnati Community Video is a member of the Alliance for Community Media, a national membership organization comprised of more than thirteen hundred organizations and individuals in more than seven hundred communities, connected with public, educational and governmental ("PEG") access on cable television systems. PEG centers throughout the national produce more than 20,000 hours of original programming per week; this is more than CBS, NBC, ABC, and PBS combined.

PEG access centers would welcome the opportunity to present programming accessible to blind and deaf audiences. We believe that cable operators, the U.S. Department of Education, other governmental entities, or private funds and foundations may provide an appropriate source for funding. However, requiring PEG access centers to shoulder the financial and administrative burden or providing or requiring that every program be closed-captioned would mean the end of PEG access for deaf and non-deaf viewers alike. Cincinnati Community Video urges the Commission to exempt PEG access centers from any blanket closed-captioning requirements, or, in the alternative, to

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identify and provide for alternate funding sources to allow some PEG programming to be made available to deaf audiences.

Both cost and the unique nature of public access programming prevent PEG centers from regularly providing closed-captioning services. Cincinnati Community Video's total budget for 1997 is \$670,528, which covers all salaries, administrative expenses, capital purchases, and overhead costs. The Commission has suggested that closed-captioning a program may be conservatively priced at \$2,500 per program-hour. If closed-captioning were required, Cincinnati Community Video could caption only 268 hours of programming per year, with no funds left over for salaries, equipment, and expenses.

Moreover, PEG centers generally do not produce their own programming; instead, program producers are generally either individuals or small non-profit organizations working with volunteer personnel. Placing responsibility for closed-captioning on access program producers is not realistic. Requiring, for example, public high-schools' educational access distance learning-GED programs to close-caption could cause most school districts to cease offering these programs entirely. Requiring that PEG volunteer producers close-caption their programming at their own expense would contradict the purpose of PEG access, converting free access into access at \$2,500 per hour.

We strongly support the rights of deaf viewers to have access to PEG access programming. However, we must ask the Commission to require captioning only when an outside funding source makes such captioning financial possible.

Respectfully submitted,



Joyce Miller
Executive Director